

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE VALVE ANTITRUST LITIGATION

No. 2:21-cv-00563-JNW

**STIPULATION AND (PROPOSED)
ORDER RE: SUMMARY JUDGMENT
AND *DAUBERT* BRIEFING**

**NOTE ON MOTION CALENDAR:
JULY 2, 2025**

The Parties respectfully request that the Court enter an order extending the Parties' deadline to file motions to seal related to summary judgment and *Daubert* briefing.

1. The high volume of materials to review and meet and confer over establishes good cause for this extension. Given the volume of material, the Parties have not yet been able to meaningfully meet and confer regarding their respective proposed redactions and narrow the scope of issues in dispute. Altogether, Valve's Motion for Summary Judgment (Dkt. 453), Valve's Motion to Exclude the Opinions of Dr. Steven Schwartz

(Dkt. 449), Valve’s Motion to Exclude the Opinions of Professor Joost Rietveld (Dkt. 451), Plaintiffs’ Motion to Exclude the Opinions of Professor Gautam Gowrisankaran (Dkt. 455), and the evidence and declarations on which the parties rely, collectively include over 3,000 pages of expert declarations and other materials referencing documents or information designated as “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEY’S EYES ONLY” by the Parties or third parties under the protective orders in this case. *See* Dkts. 95, 135, 139, 154, 155, 159. The Parties believe that the requested extension will enable them to further meet and confer in a productive manner to minimize issues for the Court to resolve.

2. The Parties therefore stipulate and agree as follows:

- a. The deadline for the Parties to meet and confer and file motions to seal pursuant to LCR 5(g)(3), and replacement briefs as appropriate, with respect to opening briefs for Valve’s Motion for Summary Judgment and the Parties’ *Daubert* Motions shall be extended to July 31, 2025.
- b. Valve will provide Plaintiffs with its requested redactions, and the bases for those requests, no later than 5pm PT on Wednesday, July 23, 2025, in order to provide Plaintiffs with sufficient time to review the proposed redactions and to provide the Parties with sufficient time to meet and confer before the July 31, 2025 filing deadline.

3. For clarity, the Parties intend to file motions to seal with respect to their forthcoming oppositions and replies to Valve’s Motion for Summary Judgment and the Parties’ *Daubert* Motions consistent with the protocol and deadlines set forth in the Court’s May 22, 2025 Order (Dkt. 448).

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 2nd day of July, 2025.

/s/ Alicia Cobb

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8 PURSUANT TO STIPULATION, IT IS SO ORDERED that:

9 The Parties shall meet and confer in connection with Valve's Motion for Summary
10 Judgment and the Parties' *Daubert* Motions, and file replacement briefs, expert reports,
11 exhibits, evidence, and declarations with necessary redactions, and a corresponding motion to
12 seal by July 31, 2025. Further ordered that Valve will provide Plaintiffs with its requested
13 redactions, and the bases for those redactions, no later than 5pm PT on Wednesday, July 23,
14 2025

15 DATED this __ day of _____, 2025.

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18 _____
19 Hon. Jamal N. Whitehead
20 UNITED STATES DISTRICT JUDGE
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